

Marc Wolstenholme
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Plaintiff in Pro Per

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MARC WOLSTENHOLME,
Plaintiff,
vs.
RIOT GAMES, INC.,
Defendant

CASE NO. 2:25-CV-00053-FMO-BFM HON.

Hon. Fernando M. Olguin

DECLARATION OF MARC
WOLSTENHOLME

SUPPLEMENT TO PLAINTIFF'S MOTION
TO ENFORCE COURT ORDERS, COMPEL
DISCOVERY, AND REQUEST
HEIGHTENED DISCOVERY
ENFORCEMENT

Dated this: April 15, 2025

M. WOLSTENHOLME.
[MARC WOLSTENHOLME]

1 SUPPLEMENT TO PLAINTIFF’S MOTION TO ENFORCE COURT ORDERS,
2 COMPEL DISCOVERY, AND REQUEST HEIGHTENED DISCOVERY ENFORCEMENT
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5 **TO THE HONORABLE COURT:**
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7 Plaintiff Marc Wolstenholme, appearing pro se, respectfully submits this
8 Supplemental Motion and Notice of Defendant Riot Games, Inc.’s continued noncompliance
9 with discovery obligations. Despite the Court’s clear orders and Plaintiff’s timely service of
10 discovery requests on March 14, 2025, Defendant has now failed to produce any substantive
11 responses, answers, or documents. Riot has instead issued broad, non-responsive objections that
12 demonstrate no intent to meaningfully engage in discovery but continues a pattern of bad faith.
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15 **I. NOTICE OF NONCOMPLIANCE**
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17 Riot’s responses to Plaintiff’s Requests for Admission (RFAs), Requests for
18 Production (RFPs), and Interrogatories (ROGs) contain only objections, denials, and delaying
19 language. No documents were produced. No substantive narrative responses were provided. Riot
20 continues to obstruct the truth-seeking process, in defiance of the discovery rules and the Court’s
21 order.
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II. PATTERN OF ABUSE AND PUBLIC RECORD

This conduct is not isolated. Riot Games, Inc. has a well-documented history of suppressing evidence, targeting vulnerable parties, and utilizing public relations campaigns to obscure IP theft, employee abuse, and discrimination. The Plaintiff's claims intersect with this behavior. Riot's continued concealment of project data and refusal to participate in discovery reflects a larger pattern of obstruction, cover-up, and public misrepresentation.

III. REQUEST FOR HEIGHTENED DISCOVERY ENFORCEMENT

Plaintiff respectfully requests that the Court issue the following relief:

1. Compel Riot Games, Inc. to immediately produce all documents, communications, and responses to Plaintiff's March 14, 2025 discovery requests.

2. Order Riot to preserve and produce the following, under penalty of Rule 37(e):

- Internal metadata related to Arcane development;
- Slack logs and internal communications from Fortiche and Riot;
- AI generation logs, source control data (e.g., Git), and document authorship chains;
- Project management timelines and submission tracking from 2018 to 2024.

3. Appoint a neutral Special Master or forensic third party to oversee inspection and extraction of responsive data from Riot's systems.

4. Extend the discovery period and toll all deadlines pending full compliance.

1 5. Issue a protective order ensuring Riot does not destroy, move, or modify any
2 internal development data.

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4 6. Refer suspected obstruction to appropriate state or federal authorities if
5 spoliation is uncovered.

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7 These steps are not extreme under the circumstances. Riot has repeatedly used
8 litigation procedure as a weapon against a vulnerable pro se litigant, and its refusal to cooperate
9 in discovery is now a matter of record. Court intervention is essential to protect Plaintiff's right
10 to a fair and complete adjudication.

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12 “See Exhibits A–C, attached hereto, which show that Defendant’s responses
13 consist solely of objections and denials, with no documents or meaningful narrative answers
14 provided.”
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Declaration of Authenticity:

I, Marc Wolstenholme, declare under penalty of perjury that the statements made are true and accurate

Executed on April 15, 2025, in Coventry, England.

Respectfully submitted,

Signature: *M. WOLSTENHOLME*

Marc Wolstenholme

Plaintiff in Pro Per

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